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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

JANE ROE, an individual; MARY ROE,  
an individual; SUSAN ROE, an  
individual; JOHN ROE, an individual;  
BARBARA ROE, an individual;  
PHOENIX HOTEL SF, LLC, a  
California limited liability company;  
FUNKY FUN, LLC, a California limited  
liability company; and 2930 EL  
CAMINO, LLC, a California limited  
liability company,

Plaintiffs,

v.

CITY AND COUNTY OF SAN  
FRANCISCO, a California public entity,

Defendants.

Case No. 4:24-cv-01562-AMO

**DECLARATION OF JANE ROE (A  
PSEUDONYM)**

**DECLARATION WITH TRUE NAME  
OF DECLARANT TO BE FILED  
UNDER SEAL**

**DECLARATION WITH TRUE NAME  
OF DECLARANT REDACTED TO  
BE PUBLICLY FILED**

1 I, [REDACTED], declare as follows:

2 1. I am over the age of 18. I do not speak much English. However, I read  
3 English pretty well. This declaration was also translated word-for-word for me. I  
4 fully understand its contents. I have personal knowledge of the facts set forth herein  
5 and if called as a witness, I could and would competently testify about them.

6 2. I work full-time as a housekeeper. I am married. Both my husband and  
7 I are immigrants. My husband works full-time as a cook and also does not speak  
8 much English. We have two daughters, ages 9 and 5. We live in an apartment on  
9 Ellis Street, between Hyde and Larkin, in the center of the Tenderloin District of San  
10 Francisco. My family shares our apartment with another family with young children.  
11 The parents of that family are also immigrants.

12 3. Open-air drug deals occur on the sidewalk in front of my apartment  
13 building. The drug-dealing happens all day, every day. Those involved in narcotics  
14 sales block the entrance to my building. The image below fairly and accurately shows  
15 a typical scene in front of our apartment, including drug transactions.



1           4.       When I enter or leave my apartment, I encounter drug dealers, people  
2 on the sidewalk who are openly injecting or smoking narcotics, and people lying on  
3 the sidewalk who appear unconscious or dead.

4           5.       On one occasion, a person in front of my apartment building threatened  
5 to cut my throat. On other occasions, people outside my building have threatened me  
6 with knives and hammers.

7           6.       People gathered in front of my family's apartment building sometimes  
8 start smokey fires, using things like old tires, trash, or old furniture as fuel. One of  
9 my daughters has severe asthma and cannot tolerate smoke. I have politely asked  
10 people in front of our building not to burn things for the sake of my daughter's  
11 health. They responded by threatening to kill me. I have never seen the City do  
12 anything to stop the fires on the sidewalk in front of our home.

13          7.       Tent encampments and bulky items block the sidewalk in front of and  
14 near our apartment building. People in the encampments keep unleashed dogs that  
15 bark and growl at me and my family when we walk by. Displays of stolen goods for  
16 sale block the sidewalk. Trash and biohazards, such as used syringes and feces, litter  
17 the area. I once moved garbage from the entrance to my building and was stuck by a  
18 used syringe. I, my husband, and my daughters must step into the busy street to  
19 walk around these hazards, dangers and obstacles.

20          8.       The images below fairly and accurately depict the typical conditions that  
21 I and my family encounter when we go outside of our apartment building.

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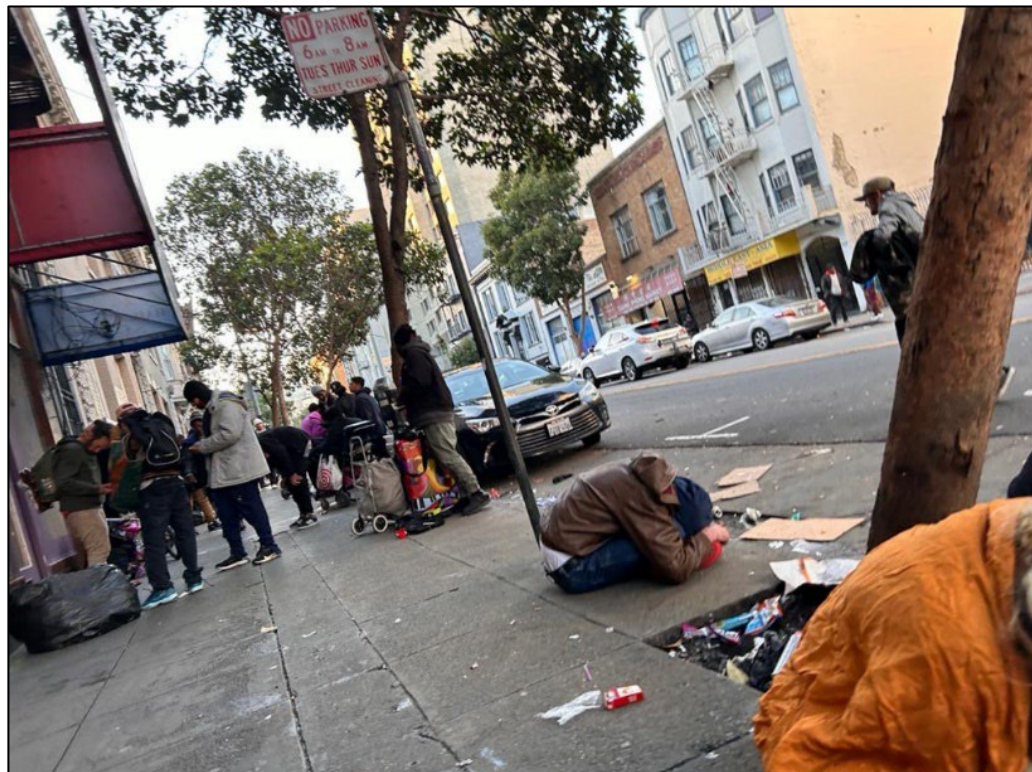
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1           9.     I rarely see uniformed members of the San Francisco Police Department  
2 on foot patrol in my neighborhood. When I have seen SFPD officers, I have asked  
3 them for help with the people who have taken over the sidewalks. In response, the  
4 police officers told me that there is nothing they can do because the City gives people  
5 on the street more protection than me.

6           10.    Every school day morning, I escort my daughters to the bus stop and  
7 then ride with them to their school. I do the same thing in reverse in the afternoon. I  
8 am terrified for my daughters' safety each time we makes the trip. Our girls can  
9 never be outside unless accompanied by me and/or my husband.

10          11.    When I go outside of my apartment, either alone or with my family, I  
11 am really scared because I am always afraid something bad will happen to us.  
12 My husband and I are not high wage earners. I really wish my daughters could grow  
13 up in a better place, which does not have so much corruption, drugs, and bad people.  
14 It is a frustration I have every day, but do not have enough money to move.

15          12.    I decided to get involved in this lawsuit because conditions around our  
16 home are deplorable and dangerous. I am not seeking to recover money damages in  
17 this lawsuit. What I want is for the City to immediately implement solutions that  
18 make the sidewalks and public spaces around my family's home clean, safe and  
19 accessible. Even though my husband and I are immigrants and we do not make much  
20 money, I want the City to treat me, my family, and our neighborhood fairly, the same  
21 as it treats people in the nice neighborhoods.

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1           13. I want to pursue this lawsuit because my neighborhood desperately  
2 needs help. However, I am afraid that if my name were to be publicly revealed, then I  
3 or my family might get hurt by the drug dealers and users around our home. I agreed  
4 to go forward with this lawsuit on the understanding that my real name would not be  
5 publicly disclosed. I am not sure whether I would go forward with this lawsuit if the  
6 court ordered my name to be disclosed publicly.

7           I declare under the laws of the State of California that the foregoing is true  
8 and correct to the best of my knowledge.

9           Executed on this 20<sup>th</sup> day of March, 2024, at San Francisco, California.

10 [Redacted Signature]

11 [Redacted Name]